

Wyoming Wool Growers Association

March 11, 2018

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Bureau of Land Management, Casper Field Office
Attn: Mike Robinson, Project Manager
2987 Prospector Drive
Casper, WY 82604

Dear Mr. Robinson,

We appreciate the opportunity to provide comments on the draft Environmental Impact Statement for the Converse County Oil and Gas Project in Eastern Wyoming. The Wyoming Wool Growers Association has represented the interests of Wyoming's sheep producers since 1905. We believe this project is an important economic opportunity for the state and county and has direct impacts for a number of sheep producers that own land within the project area.

We support Alternative B as the best of the options provided. We believe this alternative would allow Converse County and the State prolonged, efficient economic growth. A number of sheep producers have significant mineral ownership in the project area and we believe Alternative B would best allow them to produce their private mineral properties.

We believe the Draft EIS does not do enough to address the private property rights of landowners who will be involved in this project. It is our opinion that BLM needs to recognize the vast majority of this project will take place on private surface. In some cases operators and landowners have identified potential sites for several hundred wells with not a single well pad on federal surface. It is our opinion that the BLM plan should recognize the state and federal laws already on the books when it comes to private property, including those private property rights in relation to the NHPA (including ownership of artifacts), supposed view shed rights, and the like. Furthermore, there needs to be a general recognition that landowner's decisions on private surface should be prevailing (within reason) regarding surface decisions.

Again, we appreciate the opportunity to offer our comments on the draft EIS. If further information is needed, please do not hesitate to contact our office.

Sincerely,



Amy W. Hendrickson
Executive Director

